

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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LAWRENCE MALLY, Individually and on Behalf of All others Similarly Situated,	)	Civil Action No. 1:07-cv-7097 (DLC)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,	)	
	)	
	)	
Defendants	)	

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MILTON PFEIFFER, On Behalf Of Himself And All Others Similarly Situated,	)	Civil Action No. 1:07-cv-7252 (DLC)
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
	)	
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,	)	
	)	
	)	
Defendants	)	

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(additional captions listed on the following page)

**MOTION OF PELO a.s. TO CONSOLIDATE, TO BE APPOINTED LEAD  
PLAINTIFF, AND FOR APPROVAL OF  
ITS SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

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ISAAC FISHMAN, Custodian for the IBF Foundation,	) Civil Action No. 1:07-cv-7312 (DLC)
	)
Plaintiff,	)
	)
v.	)
	)
QIAO XING UNIVERSAL TELEPHONE, INC., WU RUI LIN, WU ZHI-YANG, ALBERT LEUNG, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, Grobstein Horwatht Co. LLP	)
	)
Defendants.	)

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MICHAEL LOCKE, On Behalf Of Himself And All Others Similarly Situated,	) Civil Action No. 1:07-cv-7693 (DLC)
	)
Plaintiff,	)
	)
v.	)
	)
QIAO XING UNIVERSAL TELEPHONE, INC., WU RUI LIN, WU ZHI-YANG, ALBERT LEUNG, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, Grobstein Horwatht Co. LLP	)
	)
Defendants.	)

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REUVEN LAPIN, On Behalf Of Himself And All Others Similarly Situated,	) Civil Action No. 1:07-cv-7829 (DLC)
	)
Plaintiff,	)
	)
v.	)
	)
QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG,	)
	)
Defendants.	)

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**PLEASE TAKE NOTICE** that PELO a.s. (“Movant”) hereby moves the Court for an Order pursuant to Rule 42 of the Federal Rules of Civil Procedure, consolidating all related actions for all purposes and appointing it Lead Plaintiff. In addition, Movant moves this Court for an Order pursuant to Section 21D(a)(3)(B)(v) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B)(v), approving its selection of the law firm of Murray, Frank & Sailer LLP as Lead Counsel for the Class.

Movant makes this motion based on the complaints filed herein, the Memorandum of Law submitted contemporaneously herewith, the Declaration of Brian Murray in Support of the Movant’s Motion to Consolidate, to be Appointed Lead Plaintiff, and for Approval of Its Selection of Lead Counsel and Liaison Counsel, executed on October 9, 2007, and on all other pleadings, motions, and orders in this action.

Dated: October 9, 2007  
New York, New York

**MURRAY, FRANK & SAILER LLP**

By: \_\_\_\_\_/s/\_\_\_\_\_  
Brian P. Murray (BM- 9954)  
275 Madison Avenue, 8<sup>th</sup> Floor  
New York, NY 10016  
Telephone: (212) 682-1818  
Facsimile: (212) 682-1892

**Proposed Lead Counsel for the Class**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury, that a true and correct copy of the above and foregoing MOTION OF PELO A.S. TO CONSOLIDATE, TO BE APPOINTED LEAD PLAINTIFF, AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL was served by electronic filing to registered users in this action, and by regular United States mail, postage prepaid, this 9<sup>th</sup> day of October, 2007, to the following:

**Plaintiffs' Counsel**

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Gregory M. Nespole , Esq. <b>Wolf Haldenstein Adler Freeman &amp; Herz LLP</b> 270 Madison Avenue New York, NY 10017 Tel: (212) 545-4600 Fax: (212) 545-4693	Evan J Smith, Esq. <b>Brodsky &amp; Smith, L.L.C.</b> 240 Mineola Blvd. Mineola, NY 11501 Tel: (516) 741-4977 Fax: (516) 741-0626
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**Defendants and or Defendants' Counsel**

<p>Jack C. Auspitz, Esq. <b>Morrison &amp; Foerster LLP</b> 1290 Avenue of the Americas New York, NY 10104 Tel: (212) 468-8046 Fax: (212) 468-7900</p> <p><b>Counsel for Qiao Xing Universal Telephone, Inc. and Albert Leung, Sonny Kwok Wing Hung, Wu Rui Lin, Wu Zhi-Yang, Yi Hong Zhang, Ze Yun Mu, Rui Lin Wu, Zhi Yang Wu,</b></p>	<p><b>Grobstein, Horwath &amp; Co. LLC</b> 15233 Ventura Blvd. 9<sup>th</sup> Floor Sherman Oaks, CA 91403 Tel: (818) 501-5200 Fax: (818) 907-9632</p>
<p>Albert Leung c/o Qiao Xing Universal Telephone, Inc. Qiao Xing Science Indus. Park Tang Quan Huizhou City Guangdong, China 516 023</p>	

/s/

Thomas J. Kennedy